

United States Bankruptcy Court  
District of Maryland

Brandon M. Chasen, Sr.

Alleged Debtor

25-15437

7

**MOTION TO CONVERT CASE TO A VOLUNTARY  
CHAPTER 7 PURSUANT TO 11 U.S.C. § 706(a)**

NOW COMES the alleged debtor, Brandon M. Chasen, Sr. (the "Debtor"), by and through the undersigned counsel, and pursuant to 11 U.S.C. § 706(a), respectfully moves this Honorable Court for the entry of an order converting this involuntary Chapter 7 case to a voluntary Chapter 7 case, and in support thereof states as follows:

1. That an involuntary petition under Chapter 7 of the Bankruptcy Code was filed against the Debtor on or about June 16, 2025 by Sandy Spring Bank, Southland Insulators of Maryland, and Ferguson Enterprises, LLC.
2. That the Debtor is eligible to be a debtor under Chapter 7 of the Bankruptcy Code pursuant to 11 U.S.C. § 109.
3. That pursuant to 11 U.S.C. § 706(a), a debtor may convert a case under Chapter 7 to a case under Chapter 11, 12, or 13 "at any time" if the case has not previously been converted under §§ 1112, 1208, or 1307.
4. That courts have held that a debtor may also elect to proceed voluntarily under Chapter 7 following an involuntary filing, particularly once an order for relief has been entered or where the debtor consents to the relief sought.
5. That the Alleged Debtor makes this election in good faith and intends to cooperate fully with the appointed trustee and the requirements of the Bankruptcy Code, including the filing of all necessary schedules and statements.

WHEREFORE, the Alleged Debtor requests that his Honorable Court:

- A. Enter an Order converting this case to a voluntary Chapter 7 case; and,
- B. Direct the Debtor to file all required schedules, statements, and disclosures as in a standard voluntary Chapter 7 filing; and,
- C. Grant such other and further relief as the Court deems just and proper.

July 8, 2025

/s/ Brandon M. Chasen, Sr.

Brandon M. Chasen, Sr.

Alleged Debtor

/s/ Adam M. Freiman

Adam M. Freiman 23047 CPF#:9306230121

Attorney for Alleged Debtor

Law Offices of Adam M. Freiman, P.C.  
115 McHenry Ave.  
Suite B4  
Pikesville, MD 21208  
410-486-3500  
Fax: 410-630-8066  
adam@pikesvillelaw.com

**United States Bankruptcy Court  
District of Maryland**

In re **Brandon M. Chasen, Sr.**

Debtor(s)

Case No. **25-15437**

Chapter **7**

**CERTIFICATE OF SERVICE**

I hereby certify that on **July 11, 2025**, I reviewed the Court's CM/ECF system and it reports that an electronic copy of the **Motion to Convert** will be served electronically by the Court's CM/ECF system on the following:

Sandy Springs Bank  
Southland  
Ferguson Enterprises, Inc.

/s/ Adam M. Freiman

Adam M. Freiman 23047 CPF#:9306230121  
Law Offices of Adam M. Freiman, P.C.  
115 McHenry Ave.  
Suite B4  
Pikesville, MD 21208  
410-486-3500 Fax: 410-630-8066  
adam@pikesvillelaw.com